

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>IN RE:</b>	)	<b>Chapter 13</b>
	)	
<b>Latoya Hopkins,</b>	)	<b>Case No. 22-00268</b>
	)	
<b>Debtor(s).</b>	)	<b>Judge Hunt</b>

**AMENDED MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Latoya Hopkins, by and through her attorneys, Cutler & Associates, Ltd., and in support of his Motion to Modify Plan:

1. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on January 19, 2022 and the Plan was confirmed on March 11, 2022.
2. The Debtor's confirmed plan calls for trustee payments of \$521 for 60 months until the end of the plan with unsecured creditors receiving 12% of their unsecured claims.
3. The Debtor's plan calls for payments to secured lender, Regional Acceptance Co, for its claim on the Debtor's 2017 Kia Forte.
4. However, due to the recent rise in thefts of older Hyundai and Kia vehicles, the Debtor's insurance costs for the Forte have risen significantly. These increased costs have made keeping the car very difficult while making the Trustee payments.
5. Accordingly, the Debtor seeks to modify the plan to surrender the vehicle to Regional Acceptance Co and to stop any further payments to the lender for its secured claim.
6. The Debtor will also be bringing a motion to incur to allow her to purchase a new vehicle to replace the Kia Forte.

7. The surrender of the vehicle would reduce the remaining principal balance to the Trustee to approximately \$10,600. Therefore, the Debtor further seeks to reduce her monthly payments to \$236 per month for the remainder of the plan.

8. This modification would still result in the Debtor's unsecured creditors receiving 10% of their unsecured claims.

WHEREFORE, the Debtor, Latoya Hopkins, prays for the following relief:

- A. That this Court enter an order modifying the Debtor's Plan to provide for the surrender of the 2017 Kia Forte to Regional Acceptance Co and no further payments shall be made to Regional Acceptance Co for its secured claim;
- B. That this Court enter an order modifying the Debtor's plan to reduce the trustee payments to \$236 per month for the remainder of the plan; and
- C. For such other and further relief that this Court may deem equitable and just.

Respectfully Submitted,

Dated: April 12, 2023

By: /s/ David H. Cutler  
One of the attorneys for the Debtor

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